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business." *Held*, that the practice of law is not a "lawful business" within the meaning of the statute. *In re Co-operative Law Co.*, 92 N. E. 15 (N. Y.).

The practice of law is a lawful business only for those who have fulfilled the statutory requirements. N. Y. CONSOL. LAWS (1909), TIT. JUDICIARY LAW, §§ 460, 466. A corporation could not meet the requirement of learning or good character, nor take an oath of office. It was contended in the principal case that the statute was satisfied if the corporation conducted its legal business through duly licensed attorneys. *Cf. State Electro-Medical Institute v. State*, 74 Neb. 40. But the corporate fiction cannot be so easily disregarded. If the attorneys employed by the corporation must act as its agents, in strict legal theory it is the corporation that is practicing law. The artificial entity intervenes between the licensed attorney and the client. Even if the attorneys were permitted to act entirely in their own names, public policy would condemn the business of finding clients for lawyers for a share in the fees. See *Langdon v. Conlin*, 67 Neb. 243; *Alpers v. Hunt*, 86 Cal. 78. The result in the principal case is a desirable one, since it protects the bar from the danger of having its members controlled by corporations financially interested in encouraging litigation.

CORPORATIONS — STOCKHOLDERS: RIGHTS INCIDENT TO MEMBERSHIP — LEGALITY OF VOTING TRUST. — The majority stockholders of a corporation transferred their stock to trustees, receiving trust certificates in return, under an agreement by which the trustees were to have an irrevocable power to vote the stock, and the privilege of purchasing at a certain price, for the benefit of the other members, the stock of any member of the syndicate wishing to sell, the object being to insure the continuance of the present membership and policy of the corporation. A transferee of some of the trust certificates sought to overthrow the agreement so as to enable him to vote his stock. *Held*, that the agreement is valid, and that the trustees' power, being coupled with an interest, is irrevocable. *Boyer v. Nesbitt et al.*, 76 Atl. 103 (Pa.).

An agreement to last for fifteen years, similar to the above, and for a similar purpose, was made by the majority stockholders of a banking corporation. A stockholder not in the agreement sought to have it overthrown, and the trustees enjoined from voting the stock. *Held*, that the agreement is against public policy and void, and that the trustees will be enjoined. *Bridgers v. First Nat. Bank of Tarboro et al.*, 67 S. E. 770 (N. C.). See NOTES, p. 51.

CRIMINAL LAW — DEFENSES — JUSTIFICATION UNDER PRIOR DECISION OF COURT. — A state statute making criminal the soliciting or accepting of any order for the sale or delivery of liquor was declared invalid by the Supreme Court of the state. Subsequently the same court overruled its decision and declared the law valid. In the meantime, the defendant violated the statute, and after the second decision, he was convicted. *Held*, that the conviction was wrong. *State v. O'Neil*, 126 N. W. 454 (Ia.).

For a discussion of this point, see 18 HARV. L. REV. 541.

CRIMINAL LAW — STATUTORY OFFENSES — VENDEE AS ACCOMPLICE OF VENDOR IN ILLEGAL LIQUOR SALE. — A purchaser in an illegal sale of intoxicating liquor testified against the seller. The seller contended that, as an accomplice, his testimony required corroboration. *Held*, that a purchaser is not an accomplice. *Trinkle v. State*, 127 S. W. 1060 (Tex., Ct. Cr. App.).

The witness is an accomplice of the defendant only if he could be indicted for the same crime. *Keller v. State*, 102 Ga. 506. The courts, however, uniformly declare that a purchaser of intoxicating liquors is not indictable. *Commonwealth v. Kostenbauder*, 20 Atl. 995 (Pa.). It is argued that the purchaser is not indictable for directly engaging in the sale, for a purchase is the exact